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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LATESHA WATSON,

Plaintiff,

v.

CITY OF HENDERSON; BRISTOL  
ELLINGTON; KEVIN ABERNATHY;  
KENNETH KERBY; DEBRA MARCH;  
RICHARD DERRICK; RICHARD  
MCCANN; NICK VASKOV; KRISTINA  
GILMORE; DOES I through X, inclusive,

Defendants.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
AMEND COMPLAINT AND/OR  
REQUEST RECONSIDERATION**

**(FIRST REQUEST)**

[ECF 33, 35, 36, 49, 50, 84]

Plaintiff, LaTasha Watson ("Watson") by and through counsel of record, Marc P. Cook, Esq. of the law firm of COOK & KELESIS, LTD.; Defendants, Kevin Abernathy, Richard McCann and Kenneth Kerby, by and through counsel of record, Nicholas M. Wiczorek, Esq. of the law firm of CLARK HILL PLLC; and Defendants City of Henderson, Debra March, Richard Derrick, Bristol Ellington, Nicholas Vaskov and Kristina Escamilla Gilmore, by and through counsel of record, Patrick G. Byrne, Esq. of the law firm of SNELL & WILMER LLP, hereby stipulate to extend the deadline for Plaintiff to amend her complaint and/or request reconsideration of this Court's

September 23, 2021 Order (1) Granting in Part Motions to Dismiss, (2) Granting in Part Motion for Leave to Amend, (3) Denying as Moot Anti-SLAPP Special Motion to Dismiss, and (4) Denying as Moot Motion for Leave for Discovery [ECF 84]. This extension is necessary for the following reasons:

1. In the three week period between entry of the Court's Order and the deadline it set for Plaintiff to Amend her complaint, Plaintiff's counsel, Marc P. Cook, Esq., has three full-day settlement conferences, each of which involves large, complex cases, which will require extensive briefing and preparation.
2. Also during this period, Plaintiff's counsel, Julie Sanpei, Esq., had a pre-planned, out-of-state vacation.
3. As each of the Defendants are uniquely situated, Plaintiff needs additional time to analyze the reasoning set forth in the court's order, and to review and analyze voluminous documents provided by Plaintiff to determine those facts and evidence that will support either the Amended Complaint and/or reconsideration.
4. Counsel for all parties have agreed to an extension to Monday, November 1, 2021 for Plaintiff to amend her complaint and/or request reconsideration
5. The extensions are sought in good faith and not for the purpose of delay.

DATED this 4th day of October, 2021.

DATED this 1st day of October, 2021.

COOK & KELESIS, LTD.

CLARK HILL PLLC

By: /s/ Marc P. Cook

By: /s/ Nicholas M. Wieczorek

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*Attorney for Defendants Kevin Abernathy,  
Richard McCann and Kenneth Kerby*

1 DATED this 1st day of October, 2021.

2 By: /s/ Patrick G. Byrne

3 PATRICK G. BYRNE, ESQ.

4 Nevada Bar No. 007636

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9 3883 Howard Hughes Parkway, Suite 1100

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11 *Defendants City of Henderson, Debra*

12 *March, Richard Derrick, Bristol Ellington,*

13 *Nicholas Vaskov and Kristina Escamilla*

14 *Gilmore*

15 **ORDER**

16 IT IS SO ORDERED.

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19 DISTRICT COURT JUDGE  
20 DATED: October 4, 2021  
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